

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

United States District Court
Southern District of Texas
FILED

CRIMINAL COMPLAINT

Ignacio Engunzo Lopez

PRINCIPAL

A208 164 522

YOB:

1965

United States Citizen

MAY 05 2015

Case Number:

M-15-726 -M

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 4, 2015 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact Juan Pablo Valdez-Enriquez, citizen and national of the United Mexican States, along with one (1) other undocumented alien, for a total of two (2), who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Rio Grande City, Texas to the point of arrest near Rio Grande City, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On May 4, 2015, Border Patrol Agent assigned to the Rio Grande City Border Patrol Station area of responsibility, apprehended a 1 on 2 Criminal Alien Smuggling Case.

At approximately 6:30 a.m., BPA M Joffre observed two subjects in the brush approximately 800 yards north of the Rio Grande River near Midway Road in Rio Grande City, Texas. A few minutes later, BPA Joffre observed an older model Ford F-150 pickup truck drive towards the subjects' location off of Midway Road. As the truck approached the subjects, they ran out of the brush and towards the truck. Both subjects boarded the vehicle and the vehicle drove northbound on Midway Road.

BPA Joffre advised agents of the situation. BPA E. Casanova and E. Garcia were able to intercept the vehicle near Hospital Road and Expressway 83.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Amended
JG

Signature of Complainant

Sworn to before me and subscribed in my presence,

Andrew Johnson Senior Patrol Agent

Printed Name of Complainant

May 5, 2015

Date

at McAllen, Texas

City and State

Dorina Ramos

, U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-726-M

RE: Ignacio Engunzo Lopez

A208 164 522

CONTINUATION:

The driver, a United States Citizen later identified as LOPEZ, Ignacio Engunzo, was transporting two illegal aliens in his Ford F-150. The two subjects that ran out of the brush were identified as VALDEZ-Enriquez, Juan Pablo and PARAMO-Bautista, Edgar. Both subjects admitted to being illegally present in the United States.

All subjects were transported to the Rio Grande City Border Patrol Station for further processing.

Principal Statement

Ignacio Engunzo LOPEZ was read his Miranda Rights. LOPEZ understood his rights and gave a statement without an attorney present.

LOPEZ stated that he picked up the guys near a house at the south end of Midway Road. He stated that Juan Valdez contacted him via cellular phone and asked him to pick them up. LOPEZ admitted that he didn't know if he would receive money for gas or if he would have to ask for it. LOPEZ stated that they were going to work in the onion fields and that he knew it was against federal law to transport illegal aliens.

Material Witness Statement

Juan Pablo Valdez-Enriquez was read his Miranda Rights. VALDEZ understood his rights and gave a statement without an attorney present.

VALDEZ stated that he illegally crossed the Rio Grande River on May 4, 2015 and was picked up in a red truck driven by LOPEZ. VALDEZ claims that he received LOPEZ phone number from a guy in Mexico. VALDEZ stated he was supposed to be taken to his family in Palmview, Texas. VALDEZ didn't pay any money up front but he expected to be charged when he reached his family. His wife was going to pay the smuggler \$400 USD upon his arrival which included the payment for the driver.

During the drive, VALDEZ stated to have had a conversation regarding where he was going to be dropped out and LOPEZ asked him if the smuggler in Mexico had answered his calls. VALDEZ answered that LOPEZ was the only one who had answered his call. VALDEZ further stated that he asked Lopez to taken him to his home in Palmview and LOPEZ said , "no" because he needed to ask the smuggler where he was going to take him. VALDEZ was able to identify Ignacio Lopez as the driver of the Ford F-150 in a photo lineup as the driver.